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8 DUTCHINTS DEVELOPMENT LLC

9 UNITED STATES BANKRUPTCY COURT  
10  
11 NORTHERN DISTRICT OF CALIFORNIA

12 In re  
13 DUTCHINTS DEVELOPMENT LLC,  
14  
15 Debtor in Possession.

21-51255-MEH-11

Chapter 11

**DEBTOR'S STATEMENT OF NON-  
OPPOSITION TO UNITED STATES  
TRUSTEE'S MOTION TO APPOINT  
CHAPTER 11 TRUSTEE UNDER 11 U.S.C.  
§ 1104(a), OR, IN THE ALTERNATIVE, TO  
CONVERT CASE TO CHAPTER 7  
PURSUANT TO 11 U.S.C. § 1112(b); AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT AND  
RESERVATION OF RIGHTS**

Date: February 10, 2022

Time: 10:00 a.m.

Place: **Via Tele/Videoconference**

16 COMES NOW Dutchints Development LLC, Debtor in Possession herein ("Debtor"), and  
17 respectfully submits this statement of non-opposition to the United States Trustee's Motion to  
18 Appoint Chapter 11 Trustee Under 11 U.S. § 1104(a), Or, in the Alternative, to Convert Case to  
19 Chapter 7 Pursuant to 11 U.S.C. 112(b); and Memorandum of Points and Authorities in Support and  
20 Reservation of Rights, filed on January 12, 2022 (Dkt. 95). Debtor requests conversion to Chapter 7  
21 because there is no ongoing business.

22 DATED: February 4, 2022

**MACDONALD FERNANDEZ LLP**

23 By: /s/ Iain A. Macdonald

24 Iain A. Macdonald, Attorneys for  
25 Dutchints Development LLC, Debtor in Possession